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MIED (Rev. 03/11) Prisoner Civil Rights Complaint

Official Use Only		
Case Number	Judge	Magistrate Judge

Case: 5:25-cv-11574
Assigned To: Levy, Judith E.
Referral Judge: Altman, Kimberty G.
Assign. Date: 5/29/2025
Description: PRIS KEYON JAMAR EVANS v KAREN MCDONALD ET AL

PRISONER CIVIL RIGHTS COMPLAINT

This form is for use by state prisoners filing under 42 U.S.C. § 1983 and federal prisoners filing pursuant to Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 388 (1971).

Parins momaior						
Name KEYON JAMAN	EVA	ins	Prisoner No.	23610	133	
Place of Confinement ORKIANO COUNTY			ICE/J	AIL/DE	TENTIONCENT	E
Street 1201 NTEFEGRAPH ROA				State MI	Zip Code 48341	
Are there additional plaintiffs?	□Ye					
If yes, any additional plaintiffs to this act attached to the back of this complaint. Y						

Name AFFILIATES 252001 OF CRSE NUMBERS 2500108	FY	Position 5/	icieru ca Magistr	ATE PROSECU
Street/P.O. Box 1200 N TELEGIFFAID WESTWING-BUILDINGILLE	City		State MI	Zip Code
Are you suing this defendant in his/her: \Box Pe	ersonal Capacity	☐ Official Capaci	ty 🖊 Bot	h Capacities
Are you suing more than one defendant? 🎤 Ye.	s	□ No		
If yes, any additional defendants to this action sh attached to the back of this complaint. You must (personal, official or both) in which you are suing	provide their name			

I. PREVIOUS LAWSUITS

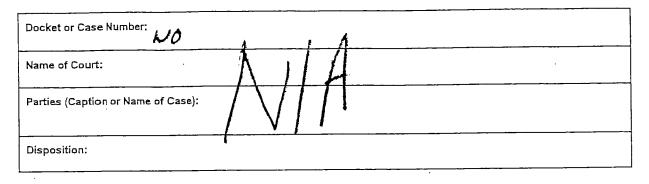
Have you filed any other lawsuits in state or federal court relating to your imprisonment?

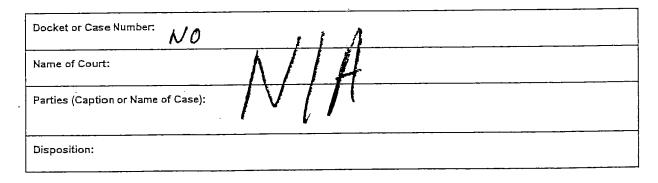
□ Yes ✓No NO

If "Yes," complete the following section. If "No," proceed to Part II.

N/A

Please list all prior civil actions or appeals that you have filed in federal court while you have been incarcerated.





Docket or Case Number: NO		
Name of Court:	. 111	
Parties (Caption or Name of Case):	MH	
Disposition:	- V 1	

Any additional civil actions should be listed on a separate sheet of 8½" x11" paper and securely attached to the back of this complaint.

II. STATEMENT OF FACTS

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include the names of other people, dates and places involved in the incident. Do not give any legal arguments or cite any cases or statutes.

THE FACTS OF MY CASE I'S IMA DISAbled UNITED STATES

CITIZEN WHO SUFFER FROM A PERMANENT MENTAL DISABILITY.

FACTS ARE IMBEING DISCRIMINATED & DEPRINED

OF MY RIGHTS UNDER (ADA) AMERICANS WITH DISABILITY (ACT)

& BEING DEPRINED OF MY RIGHTS OF THE UNITED STATES

CONSTITUTION AS AN" ACCUSED" DEFENDANT. IM HEID IN CUSTODY

AT ORKIAND COUNTY SHERIFFS OF FICE/SAIL AS A PRETRIAL DETAINED.

ON A" EXCESSIVE BAIL" FOR A INCOME AND PROTHER

THAVE 2 CASH BONDS ONE FORT BOLDOGE CASH AND PROTHER

FROM MY ONLY SOUICE FOR INCOME IS SSOSTATE BENEFITS.

THOUGH A COURT APPOITED ATTORNEY WHO REFUSES TO WITH OFFILE

FROM MY TWO PENDING CASES.

III. STATEMENT OF CLAIMS

State what rights under the Constitution, laws, or treaties of the United States have been violated, and be specific. Set forth each claim in a separate paragraph. If you intend to allege several related claims, number and set forth each claim on a separate 8½" x 11" sheet of paper and securely attach the papers to the back of this complaint.

CRUEI AND UNISHAIP PUNISHMENT" COERCIVE POWER
OF THE STATE HAS BEEN EMPROYED IN A MANNER THAT SHOCKS
THE COMMUNITY'S CONSCIENCE AND UNDERMINES THE INTEGRITY
OF OUR CRIMINAL JUSTICE SYSTEM, BY DENYING MY RIGHTS TO DUE
PROCESS OF I AW, WHICH AISO IS A VIOLATION OF MY 14th AMENDMENT.
IM BEING DEPAINED OF LIFE, LIBERTY AND TUSTICE BY BEING
HEID IN CUSTODY OVER A"48 HOUR" PERIOD OF A WALLANTIESS ARREST
WITHOUT A"PROASE (AUSE HEARING, IN FRONT OF A MAGISTRATE
WITHIN THE" JURISDICTION OF THE ALLEGED OFFENSE."
NO ARREST WALLANT, WARRANT HAS BEEN SWORN UNDER OATH /AFFILMATION
THY 4th AMENDENT RIGHTS MAS ALSO BEEN VIDIATED.
THE RIGHT OF THE PEOPLE TO BE SECURE IN THEIR PERSONS!
HOUSES PAPERS, AND EFFECTS, AGAINST UN REASONABLE SEARCHES
AND SE IZURES SHALL NOT BE VIDIATED, AND NO WALLANT SHALL ISSUE,

IV. RELIEF

State briefly and exactly what you want the Court to do for you.

I WOULD LIKE TO BE AWARDED COMPENSATORY DAMAGES BASED ON MENTAL AND EMOTIONAL DISTRESS, IMPAIRMENT OF REPUTATION, AND PERSONAL HUMILIAHION. I WOULD AISO LIKE A PERSONAL PROTECTION ORDER AGAINST3 (PPO) ON ALL DEFENDENTS AND I WOULD LIKE TO BE RELEASED FROM CUSTOPY CONFINEMENT

BUT UPON PROBABLE CAUSE SUPPORTED BY OATH OR AFFIRMATION,
AND PACTICULARLY DESCRIBING THE PLACE TO BE SEARCHED, AND THE
PENSONS OR THINGS TO BE SEIZED." DUE PROCESS CHUSE" NO AGENT OF
THE GOVERNMENT MAY SUBJECT ANY PERSON TO THE LOSS OF LIFE,
LIBERTY, OR PROPERTY WITHOUT DUE PROCESS OF LAW, THE 5 4H
AMENDMENT PROVIDES: "NO PERSON SHALL BE DEPRIVED OF LIFE,
I BETT!, OF PROPERTY, WITHOUT DUE PROCESS OF LAW, MY
SHA AMENDMENT RIGHTS ARE ALSO VIOLATED. "EQUAL PROTECTION CHUSE"
OF THE FOURTEENTH AMENDMENT READS, NO STATE SHALL DENY TO ANY PERSON
WITHIN 125 JURISDICTION THE EQUAL PROTECTION OF THE LAWS. ACCORDING TO
OAKLAND COUNT! SHERIFFS OFFICE CAW LIBARY STAFF AND THEIR RESOURCES
AT, https://micourt.courts.michigan.gov I have no active of
PENDITAL ASES.
I declare (or certify, verify, or state) under penalty of perjury that the
foregoing is true and correct.

Executed (signed) on MAY 19, 2025 (date)

Case 5:25-cv-11574-JEL-KGA ECF No. 1, Page D.5 Filed 05/29/25 Page 5 of 17 KEYON) Evens OF & ATTACHMENTS

COMPLAINT UNDER 42 U.S.C 1983

DEFENDENTS BEING SUED 1 OF 18 AFFILIAMES
KAREN D. MCDONAID BATNO. P-059083
1200 N TELEGRAPH Rd
WEST WITNG-BUILDING 14 E
PONTTAC MI 48341 POSITION-> PROSECUTOR ATTORNEY
SUING BOTH CAPACITIES OFFICIAL
2. LISA L. ASADOGRIAN POSITION JUDGE/MAGISTRATE
700 BARCLAY CIRCLE SUING BOTH CAPACITIES OFFICIAL
ROCHESTER HIUS, MI 48307
52 NO 3rd JUDICIAI DISTRICT COUTTHOUSE
3. JUDGE BARRON POSITION JUDGE/MAGISTRATE
H280 Telegraph Road BloomFieldHills, MI 48302
BloomFieldHillS, MI 48302
48th JUDICIA DIRRICI COURMENT SUTING BOTH CAPACITIES OFFICIAL
4. MICHAEL J. BOUCHARD SHERIFF/COUNTY OF OAKLAWL
1200 N Rd Bldg. 38 E POSITION SHEREFF
Pontiac, MI 48341-1044 HIGHLAND Substation
PAKIAND COUNTY SHEETFOFFICE/JATL SUING BOTH CAPACITIES OFFICIAL
5. SEAN BROWN POSITION OFFICER/COMPLAINS
21 E Church Street WitNESS
LAKE ORION MI 48302 SUING BOTH CAPACITIES OFFICIAL
OF 8 ATTHEMMENTS 8 TOTAL
OF 8 ATTHEMENTS 8 TOTAL ATTACHMENTS Plus I PROOF OF INCAYSERATION

DEFENDENTS BEING SUED 12 OF 12 AFFILIANES
6. Judge Smalls POSITION TUDE IMAGISTRATE
4280 TELEGRAPH ROAD
Bloomfield Hills, MI 48302
SUING BOTH CAPACITIES OFFICIAL
- Table 1 Control of the second of the secon
7. BRANDON BIANKS POST TION COMPIAINANT
Cumia Presentation and in
SUING PERSONAL CAPACITY
8. ROZEII BIANKSSA POSITION WITNESS
SUING PERSONAL CAPACHY
a Tranglante De
9. TYRA BIANKS POSITION WITHESS
SUING PERSONA CAPACITY
10. PATRICK VANBIESBROUCK POSITION COMPINIMANT
SUING PERSONAI CAPACITY
11. ATHAR SAYEED POSTTION COMPLAINANT
SUIN PERSONAL CAPACITY
12. REBEKAH SPATNEER POST FOOD COMPLAINING WITNESS
SUILU BOTH CAPACITY OFFICIAL
J
ALL DEFENDENTS ARE AFFILIATES OF CASE NUMBERS
252001 FY AND 25001084 FY.

Case 5:25-cv-11574-JEL-KGA ECF No. 1, PageID.7, Filed 05/29/25 Page 7 of 17

STATE OF MICHIGAN

THE DISTRICT COURT-JUDICIAL DISTRICT NO. 52/3 COUNTY OF OAKLAND

PROS. ORDER NO.

Page 1 of 3

25-02203

COMPLAINT/GENERAL INFORMATION

THE PEOPLE OF THE STATE OF MICHIGAN VS.

KEYON JAMAR EVANS/63-25-002203-01 1565 Pebble Beach Drive Pontiac, MI 48340

Defendant(s)

Date of Offense See below

Location:

VILLAGE OF LAKE ORION

Complainant:

PATRICK VANBIESBROUCK, BRANDON BLANKS, OFFICER SEAN BROWN

Complaining Witness:

OFFICER SEAN BROWN

WITNESSES

BRANDON BLANKS

DEPUTY PATRICK K. VANBIESBROUCK

ROZELL THEODORE BLANKS

TYRA BLANKS

OFFICER SEAN BROWN

DEPUTY GARRETT A. BUITING

■ DEPUTY TIMOTHY D. ELLIS

🗯 DEPUTY BRANDON M. JUZYK

--- BRIAN MARTINEZ

ERIC JAMES PRINGLE

DEPUTY CARL L. SORENSEN

REP OF HAVEN/START

HANNAH GREENLEAF

C. DANSEREAU

REP OF LAKE ORION PD

STATE OF MICHIGAN, COUNTY OF OAKLAND

COMPLAINING WITNESS says that on the date and at the location described, the defendant, contrary to law,

STATE OF MICHIGAN THE DISTRICT COURT-JUDICIAL DISTRICT NO 52/3	PROS. ORDER NO.	Page 8 06 17 3 Page 3 of 3
COUNTY OF OAKLAND	COMPLAINT/GENER	RAL
WARRANT AUTHORIZED BY THE OAKLAND COUNTY PROSECUTING ATTORNEY		
SK Colina		,
Assistant Prosecuting Attorney		
The complaining witness asks that defendant be apprehended an	d dealt with according to law.	
Subscribed and	Swom to on this day by	
Complaining	Witness	

Before the above-named District Judge/Deputy Clerk/Magistrate

Case 5:25-cv-11574-JEL-KGA ECF No. 1, PageID.9 Filed 05/29/25 Page 9 af 27 EVON DEVEN TO COMPLATIVE VNDEY TO S. C. 1903

STATE OF MICHIGAN

THE DISTRICT COURT-JUDICIAL DISTRICT NO 48 COUNTY OF OAKLAND

PROS. ORDER NO.

24-25910

COMPLAINT/GENERAL INFORMATION

THE PEOPLE OF THE STATE OF MICHIGAN

Date of Offense: See below

VS.

Location:

CITY OF BIRMINGHAM

KEYON JAMAR EVANS/63-24-025910-01 1565 Pebble Beach Drive Pontiac. MI 48340

Complainant:

ATHAR SAYEED

Defendant(s)

Complaining Witness:

SERGEANT SPRINGER

WITNESSES

SERGEANT REBEKAH SPRINGER OFFICER MAKSYM MISHCHANCHUK ATHAR S. SAYEED, SR. BETSY ABRO JENNIFER LEE MAKKE

STATE OF MICHIGAN, COUNTY OF OAKLAND

The COMPLAINING WITNESS says that on the date and at the location described, the defendant, contrary to law,

COUNT 1

on or about December 3, 2024, did willfully and maliciously destroy or injure a building or its appurtenances, located at 532 Graten St, that belonged to Athar Sayeed, and the amount of destruction or injury was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.380(3)(a). [750.3803A]

- FELONY: 5 Years and/or \$10,000.00, or 3 times the amount of destruction or injury, whichever is greater
- MALICIOUS DESTRUCTION OF BUILDING \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

(COUNT) Showtime Tuesday, December 3.@ 7:30pm Lead Veicwirg

on or about December 3, 2024, did enter, with or without breaking, a certain building or structure, to-wit: a dwelling, located at 532 Graten St, whether occupied or unoccupied without first obtaining permission to enter from the owner or occupant, agent, or person having immediate control thereof; contrary to MCL 750.115. [750.115-A]

- MISDEMEANOR: 90 Days and/or \$500.00
- BREAKING AND ENTERING (ILLEGAL ENTRY (WITHOUT OWNER'S PERMISSION)

Case 5:25-cv-11574-JEL-KGA ECF No. 1, PageID.10, Filed 05/29/25, Page 10-0613

EYON EVAILS COMPLAINT VIVER

Page 2 of 2

STATE OF MICHIGAN
THE DISTRICT COURT-JUDICIAL DISTRICT NO. 48

COUNTY OF OAKLAND

COMPLAINT/GENERAL
INFORMATION

WARRANT AUTHORIZED BY
THE OAKLAND COUNTY PROSECUTING ATTORNEY

Assistant Prosecuting Attorney

The complaining witness asks that defendant be apprehended and dealt with according to law.

Subscribed and Sworn to on this day by

Complaining Witness

Before the above-named District Judge/Deputy Clerk/Magistrate

Case 5:25-cv-11574-JEL-KGA ECF No. 1, PageID.11 Filed 05/29/25 Page 11 of 17

Lake Orion Police Department Chief Jerry L. Narsh



Witness Statement

Complaint #_____

Name Tyra Blo	inKs		
Address			<u> </u>
Date of B			
Work	Cellular		
Date & Time Completed _	11.30pm o	n 2/23/2025	
Statement Was	climbing ou	t the window	. Then
		K inside when	
Officers W	lent toward	the window.	
1.400	20.0	?	
Signature July Cl	sure of	fficer Signature	

21 E. Church St. Lake Orion. Michigan. 48362. 248.693.8321

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Case 5-25 T-11574 JEL KGA FOF No. 17 Page ID 12 Filed 05/29/25 Page 12 of 17

Lake Orion Police Department Chief Jerry L. Narsh



Witness Statement

Complaint#

Kozell Blanks Sr. ...

uuress		2	
ate of I	1 2 min		
ork			
rte & Time Completed _	2/23/2025		
atement A+ appro	Himdely 11:30 DI	m I was sterrain	- P-17
	the street nex		Tyra; and
Ne observed a			Crow)
of the L	: 1	he house. The	black
well was no	of werity clo	Hes. He looked	and my
wife and me		urned around a	and crawled
rade into the	2 window of	the house.	J yelled

21 E. Church St. Lake Orion . Michigan . 48362 . 248.693.8321

Rev 2/16

7 OF 8 A HACHMENTS

Officer Signature

Sameane was

OFFICE OF THE SHERIFF

MICHAEL J. BOUCHARD



PROOF OF INCARCERATION

Monday, May 19, 2025

To Whom It May Concern,

EVANS, KEYON #0361023 has been incarcerated in the Oakland County Jail in Pontiac, Michigan, from 02/24/2025 to the present date. His anticipated outdate is NOT YET DETERMINED. This outdate may be subject to change depending on the specifics of the sentence.

OSSADOWSKIP

880719

Oakland County Jail

Oakland County Jail 5:25-cv-11574-JEL-KGA ECF No. 1 Page D 14 Filed 05/29/25 Page 14 of 17 1201 North Telegraph Road wellpath

Pontiac, MI 48341
248-858-1472
248-858-1472
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248-858-1472
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248-858-1472

	Patient Name EVANS, KEYON	Patient Number 0361023	DOB 7/11/1990	Age 34	Gender M
--	---------------------------	---------------------------	------------------	-----------	-------------

Orders				
Order Date	Instructions	Start Date	End Date	KOP
5/6/2025	(Mirtazapine) Remeron 15 mg tablet: give 3 tablet by mouth Q HS for 90 days.	5/6/2025	8/4/2025	False
5/6/2025	buspirone 30 mg tablet: give 1 tablet by mouth BID AM & HS for 90 days.	5/6/2025	8/4/2025	False
5/6/2025	(Quetiapine) Seroquel 200 mg tablet: give 1 tablet by mouth Q HS for 90 days.	5/6/2025	8/4/2025	False
5/6/2025	(Quetiapine) Seroquel 100 mg tablet: give 1 tablet by mouth Q AM for 90 days.	5/7/2025	8/5/2025	False
5/6/2025	(Fluoxetine) Prozac 20 mg capsule: give 2 capsule by mouth Q AM for 90 days.	5/7/2025	8/5/2025	False
4/28/2025	(psyllium husk) Metamucil MultiHealth Fiber 3.4 gram/5.8 gram Oral Powder: give 1 powder by mouth Q AM for 30 days. Please send patient specific.	4/29/2025	5/29/2025	False
4/22/2025	(Docusate Sodium) Colace 100 mg capsule: give 1 capsule by mouth Q HS for 30 days.	4/22/2025	5/22/2025	False
4/1/2025	(bictegrav-emtricit-tenofov ala) Biktarvy 50 mg-200 mg-25 mg tablet: give 1 tablet by mouth Q HS for 150 days. 340B Program order.	4/3/2025	8/31/2025	False
3/19/2025	(Mirtazapine) Remeron 30 mg tablet: give 1 tablet by mouth Q HS for 90 days.	3/19/2025	6/17/2025	False

IMBEING FORCED TO TAKE THE MENTAL MEDICATIONS

OF THE JAIL WHICH (AUSEC ME TO HAVE

ADVERSE STDE AFFECTS THAT TRIGGER'S

EPIDSODES OF PTSO PARAMOIN & SCIZO MANIA

BEHAVIOR

IM BEING DENIED MY REGULAT MEDICATIONS
BECAUSE THEY ARE CONSIDERED CONTROLL SUBTRICES
SO THE JAIL CHNNOT PROVIUE THEM.

MY BRAIN FEELS DAMAGED AND INPAIR ED
BY SWHICHIM, MY MEDICATIONS BACK AND FOURTH
IM Allergic TO NON STIMULANT MEDS Which
IS WHAT THE JAIL PROVIDES.

Case 5:25-cv-11574-15L-KGA ECF No. 1, PageID.15 Filed 05/29/25 Page 15 of 17 MEYON J EVANS (ADA) DISCRIMINATION/VIOLATIONS
COMPLAINT UNDER 42 U.S. C 1983 MIEHIGAN COMPILED LAWS MENTAL HEALTH
MCL 330. 2002A MENTAL HEALTH SERVICES FOR PERSON CONFINED IN PIACE OF DETENTION; " FOR A PERSON CONFINED IN A PLACE OF DETENTION OPERATED BY A POINTICAL SUBDITION OF THE STATE AND WHO REQUESTS MENTAL HEALTH SERVICES, MENTAL HEALTH SERVICES SHAN BE PROVIDED BY THE APPROPRIATE COMMUNITY MENTAL HEALTH PROGRAM PURSUANT TO THE RESponsibilities DESCRIBED IN SECTION 206. MCL 330. 1281 b .. INVOLUNTARY TREATHEUT .. ·· VOLUNTARY Admission INTO STATE MENTAL HEALTH FALILITY, THE DEPARTMENT OF MENTAL HEALTH SHALL PROMULATE RUKS PUTSUANT TO ACT NO. 306 (Public ACT) OF 1969, AS AMENDED, BEING SECTIONS 24.201 to 24.315 OF THE MICHIGAN COMPILED LAWS, ESTABLISHING A PROCEDURE FOR THE VOLUNTARY ADMISSION INTO A STATE MENTH HEALTH FACILITY OF A PERSON CONFINED IN A PLACE OF DETENTION OPERATED By A POLITICAL SUBDIVION OF THE STATE. "INVOLUNTARY ADMISSION! INTO A STATE MENTAL HEALTH
FACILITY OF A PERSON CONFINED IN A PLACE OF DETENTION OPERATED BY A POLITICAL SUBDIVISON OF THE STATE SHALL BE GOVERNED BY 123 to 444.

SEE 1978 ACT 636, IMd 1/10/1979

Case 5:25-cv-11574-JEL-KGA ECF No. 1, PageID.16 Filed 05/29/25 Page 16 of 17

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

Prisoner Civil Rights Complaint under 42 U.S.C. § 1983

Purpose

This form is for use by state prisoners filing under 42 U.S.C. § 1983 and federal prisoners filing pursuant to Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 288 (1971).

You may file a complaint in the United States District Court for the Eastern District of Michigan if one or more of the named defendants is located within the Eastern District of Michigan or if the cause of action arose in this District.

Filling out the form

Fill out the attached form and answer each item completely in the space provided. Be sure all answers are typewritten or legibly handwritten. You must file a separate complaint for each claim, unless all the claims are related to the same incident, issue, or defendant.

- You must provide a complete and accurate list of the name of each defendant, the address for each defendant, and the capacity in which each defendant is being sued.
- If additional pages are needed, they must be typed or neatly written on 8 ½ x 11" white paper and securely attached to the complaint.
- You must tell the truth and each plaintiff must sign and date the form. If you make a false statement of a material fact, you may be prosecuted for perjury.

Filing Fee

For the current filing fee, consult the Fee Schedule on the court's website at www.mied.uscourts.gov. You are obligated to pay the fee even if the court dismisses your complaint or you voluntarily dismiss your complaint.

If unable to pay the filing fee, each plaintiff must:

- · Complete an Application to Proceed In Forma Pauperis,
- Sign the Application to Proceed In Forma Pauperis, and
- Provide a certified copy of the prison trust fund account statement for the preceding 6 month period.

If paying the fee: Checks or money orders must be made payable to "Clerk, U.S. District Court" and sent with the complaint to the address indicated below. If you pay the filing fee when you file your complaint, you will be responsible for serving the defendants. (See Instructions for Preparation and Service of Summons Forms.)

Submitting Forms

When the complaint is fully completed, mail the original and one copy of the complaint along with all attachments to:

Office of the Clerk
United States District Court
231 W. Lafayette Boulevard, Fifth Floor
Detroit, MI 48226

1 COMPLETATO 8 TOTAL AHACHMENTS 1 MEDICAL UN DUCUMENT 1 M.C.L STATUE NO.+

Failure to comply with all of the instructions will result in unnecessary delays

KEYON J EUANS #0361023 OAKLAND COUNTY JAZL POBOX 436017 FONT HAC, MH 48341

[n]CLERK'S OFFICE DETROIT MAY 2 9 2025 0 OFFICE OF THE CIERK UNITED STATES DISTRICT CO 231 W. LAFAYETTE Boulevard, 5+

DETROIT, MI 48226